

# EXHIBIT 14

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION**

**JULIETA GARIBAY, *et al.***

**vs.**

**DAVID WHITLEY, *et al.***

§  
§  
§  
§  
§

**Civil Action No. 2:19-cv-00040**

**DECLARATION OF ELENA KEANE  
IN SUPPORT OF APPLICATION FOR TEMPORARY RESTRAINING ORDER**

STATE OF TEXAS

COUNTY OF GALVESTON

§  
§

1. My name is Elena Keane, and I am a resident and registered voter of Galveston County.

I am over the age of 18 and fully competent to make this declaration. I have personal knowledge of each of the matters stated in this declaration.

2. I naturalized as a United States citizen in May 2018.

3. I registered to vote in May 2018 and I voted in the 2018 midterm General Election.

4. I currently have a valid Texas driver's license. The Department of Public Safety ("DPS") issued my current driver's license to me on June 8, 2018. My driver's license expires on August 18, 2023.

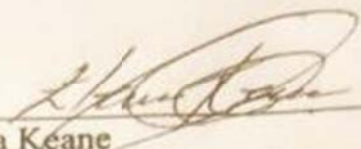
5. When I went to apply for my original driver's license, I provided my green card to prove my lawful presence.

6. I received a letter dated January 28, 2019 from the Galveston County Tax Assessor-Collector stating that: "My office has received information concerning your registration to vote. Your registration status is being investigated because there is reason to believe

you may not be a United States citizen.” The letter asked me to provide proof of my United States citizenship. The letter said that if I did not provide proof of citizenship, that my registration would be cancelled in 30 days.

7. I later received a second letter, dated January 30, 2019, from the Galveston County Tax Assessor-Collector, which stated: “[T]he SOS notified me that your citizenship status was confirmed by the Texas Department of Public Safety and that no further action is required by you. Please accept my apologies for this error. Your status as a registered voter in Galveston County is Active and no further action is necessary.”
8. These letters made me very confused about my voter registration status. I do not want to vote any more in the future. I feel very worried that I did something wrong when I registered to vote, even though I know I am a United States citizen. I am worried that I am going to be investigated for registering to vote or because I voted, and that I am going to be removed from the voter rolls. I do not understand why I am included on the list of people who are accused of illegal registration and voting.
9. I do not know how I would be able to become a registered voter if I am removed from the voter rolls. I would not reregister if I am removed from the voter rolls (despite the fact that I am a United States citizen). I feel worried that if I vote again I will be criminally investigated.

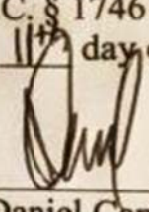
I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed in Galveston County, Texas on 11th day of February, 2019.

  
Elena Keane

**CERTIFICATE OF TRANSLATION**

1. My name is Daniel Candelaria Olvera and I speak English and Spanish.
2. I sight translated the foregoing declaration from English to Spanish by reading it to Elena Keane in Spanish.
3. Elena Keane affirmed that the contents of the declaration were true and correct to the best of her knowledge.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed in Galveston County, Texas on the 11<sup>th</sup> day of February, 2019.

  
Daniel Candelaria Olvera